

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:
Joseph Zwicharowski	: Chapter 13
Debtor	: Case No.: 17-11811

MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now, Joseph Zwicharowski, hereinafter referred to as "Debtor" and moves this Honorable Court to vacate its October 3, 2018 Order Modifying Section 362 Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about March 15, 2017.
2. The Chapter 13 bankruptcy matter was assigned case number 17-11811.
3. The Chapter 13 Plan was confirmed by this Honorable Court on November 16, 2017.
4. On or about September 7, 2018, Wells Fargo Bank, through its counsel, filed a Motion for Relief from the Automatic Stay.
5. Despite advice from counsel to the contrary, the Debtor attempted to pay the mortgagee current by way of direct payments.
6. On October 3, 2018, due to a lack of a response or appearance in the subject Motion for Relief, this Honorable Court entered an Order in favor of Wells Fargo Bank Granting the Motion for Relief from the Automatic Stay.
7. The Debtor is desirous of maintaining in possession of the real estate located at 3281 Red Lion Road, Philadelphia, PA 19114.

8. Accordingly, The Debtor is prepared to cure any and all amounts of the post-petition arrears and plans on doing so prior to the hearing in the instant matter.

WHEREFORE, for the reasons stated herein, the Debtors respectfully request that this Honorable Court Vacate its October 3, 2018 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: November 27, 2018

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107